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September 19, 2024

*By Electronic Filing*

Honorable Ronnie Abrams  
U.S. District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: In re: Paramount Global, et al., Case No. 1:24-mc-00432-RA (S.D.N.Y.)  
Certification of Meet and Confer Prior to Moving to Quash Non-Party Subpoenas

Dear Judge Abrams:

We represent Paramount Global (“Paramount”), New Remote Productions Inc. (“NRP”), and Zero Point Zero Productions, Inc. (“ZPZ”) (together, the “Non-Parties”) in the above-referenced miscellaneous action. We write, pursuant to Rule 3 of Your Honor’s Individual Rules & Practices in Civil Cases, to certify that counsel for the Non-Parties met and conferred with counsel for the plaintiffs in the underlying action (“Plaintiffs”) on multiple occasions before moving to quash, but the process was unsuccessful.

In addition to the objection letters referenced in the Non-Parties’ pre-motion letter (Dkt. 1), I spoke with Frank Trechsel by telephone on August 26, 2024, and with Scott Burroughs by telephone on September 12, regarding the objections to Plaintiffs’ subpoenas and request that Plaintiffs withdraw the deposition request. I understand from ZPZ’s additional counsel at Frankfurt Kurnit Klein & Selz PC, that they also spoke with Mr. Burroughs about these concerns on September 17, 2024. We were unable to resolve our disputes regarding the Subpoena.

Respectfully submitted,

*/s/ Jacquelyn N. Schell*

Jacquelyn Schell

cc: Scott Burroughs, Esq., Counsel for Plaintiffs, *via email*  
Frank R. Trechsel, Esq., Counsel for Plaintiffs, *via email*  
Benjamin F. Tookey, Esq., Counsel for Plaintiffs, *via email*  
Michael Salik, Esq., Frankfurt Kurnit Klein & Selz PC, *via email*  
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